EXHIBIT 3

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS : 03-MDL-1570 ON SEPTEMBER 11, 2001 : (GBD) (SN)

APRIL 27, 2021 THIS TRANSCRIPT CONTAINS CONFIDENTIAL MATERIAL

Remote Videotaped

Deposition, taken via Zoom, of JOHN

SIDEL, commencing at 7:02a.m., on the
above date, before Amanda

Maslynsky-Miller, Certified Realtime

Reporter and Notary Public in and for the

Commonwealth of Pennsylvania.

GOLKOW LITIGATION SERVICES 877.370.3377 ph| 917.591.5672 fax deps@golkow.com

Golkow Litigation Services - 1.877.370.DEPS

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1	APPEARANCES:	1	APPEARANCES: (Continued)		
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7	(843) 216-9000 rhaefele@motleyrice.com jhaileselassie@motleyrice.com jflowers@motleyrice.com	8	EXHIBITS		
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21 Professor John Sidel. 22 All parties to this deposition are appearing remotely and have agreed to the witness Page 7 Page 9 1	17			
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23 good early afternoon for you, Professor				
24 Sidel.	24			

3 (Pages 6 to 9)

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1	A. Good morning.	1	A. Yes, I do.
2	Q. My name is Sean Carter, I'm	2	Q. If at any point you don't
3	one of the lawyers representing	3	understand one of my questions, please
4	plaintiffs in the litigation in federal	4	simply tell me that.
5	court in New York arising from the	5	Is that okay?
6	September 11th attacks.	6	A. Yes.
7	The plaintiffs in that	7	Q. If you need, at any point,
8	litigation are family members who lost	8	to take a break, please just let us know
9	loved ones on 9/11, survivors of the	9	and we can do that, okay?
10	attacks, and commercial interests that	10	A. Great. Thank you.
11	suffered damages as a result of the	11	MR. CARTER: I'd like the
12	attacks.	12	court reporter to mark as
13	Are you aware of all of	13	Exhibit-597 the notice of
14	that?	14	deposition.
15	A. Yes, in broad terms.	15	deposition.
16	Q. Our purpose here today is to	16	(Whereupon, Exhibit
17	take your deposition in relation to	17	Sidel-597, No Bates, Notice of
18	opinions you've offered as an expert on	18	Oral Deposition of John Sidel, was
19	behalf of some of the defendants.	19	marked for identification.)
20	Before we begin, have you	20	marked for identification.)
21	ever been deposed in an American court	21	BY MR. CARTER:
22	proceeding?	22	Q. Professor Sidel, this is the
23	A. I gave testimony by	23	notice of deposition pursuant to which
24	telephone in an immigration case in I	24	you're testifying today.
2 7	telephone in an inningration case in 1	24	you're testifying today.
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	Page 11		Page 13
1	think it was San Francisco. And I was	1	Do you understand that this
2	_	1 2	Do you understand that this is testimony under oath in a formal legal
	think it was San Francisco. And I was sworn in, and it was matters of fact in a in terms of background on the		Do you understand that this is testimony under oath in a formal legal proceeding in the United States?
2 3 4	think it was San Francisco. And I was sworn in, and it was matters of fact in	2	Do you understand that this is testimony under oath in a formal legal proceeding in the United States? A. I do.
2 3 4 5	think it was San Francisco. And I was sworn in, and it was matters of fact in a in terms of background on the Philippines. Q. What year was that?	2 3	Do you understand that this is testimony under oath in a formal legal proceeding in the United States? A. I do. Q. And the purpose of your
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2 3 4 5 6	think it was San Francisco. And I was sworn in, and it was matters of fact in a in terms of background on the Philippines. Q. What year was that? A. It was a couple of years ago, yeah. Q. Just in case the rules in	2 3 4 5 6	Do you understand that this is testimony under oath in a formal legal proceeding in the United States? A. I do. Q. And the purpose of your deposition is to discuss opinions you've offered in a report dated July 29, 2020. Do you have that report with
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